

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

IN RE: CENTURYLINK SALES  
PRACTICES AND SECURITIES  
LITIGATION

MDL No. 17-2795 (MJD/KMM)

This Document Relates to:  
Civil File No. 18-296 (MJD/KMM)

**DECLARATION OF MICHAEL D. BLATCHLEY IN SUPPORT OF  
PLAINTIFFS' OPPOSITION TO DEFENDANTS' MOTION FOR LEAVE TO  
REOPEN THE DEPOSITION OF DR. MICHAEL L. HARTZMARK AND FILE  
SUR-REPLY, TO ADJOURN CLASS CERTIFICATION HEARING, AND TO  
ORDER AN IN-PERSON EVIDENTIARY HEARING**

I, Michael D. Blatchley, declare:

1. I am a partner at the law firm of Bernstein Litowitz Berger & Grossmann LLP which, together with Stoll Stoll Berne Lokting & Shlachter P.C., serves as Lead Counsel for Lead Plaintiff the State of Oregon by and through the Oregon State Treasurer and the Oregon Public Employee Retirement Board, on behalf of the Oregon Public Employee Retirement Fund (“Lead Plaintiff”), named Plaintiff Fernando Alberto Vildosola, as trustee for the AUFV Trust U/A/D 02/19/2009, and the proposed Class in this action. I have personal knowledge of the facts set forth herein and, if called as a witness, could and would testify competently thereto. I submit this declaration in support of Plaintiffs’ Opposition to Defendant’s Motion for Leave to Reopen the Deposition of Dr. Michael L. Hartzmark and File Sur-Reply, to Adjourn Class Certification Hearing, and to Order an In-Person Evidentiary Hearing.

2. On May 8, 2020, I (along with my co-counsel) participated in a meet and confer with Ryan Blair and other counsel for Defendants concerning the Motion. During the meet and confer, Mr. Blair indicated that while Defendants’ arguments concerning price impact were the “sterling” example of what Defendants would target through the discovery and sur-reply sought in their Motion, Defendants would also be addressing other issues, including *potentially* arguments relating to *Comcast Corp. v. Behrend*, 569 U.S. 27 (2013).

3. Attached as Exhibit A is a true and correct copy of excerpts of the transcript from the April 24, 2020 deposition of Bruce Deal.

I declare under penalty of perjury that the foregoing is true and correct.

DATED this 11<sup>th</sup> day of May, 2020.

**BERNSTEIN LITOWITZ BERGER &  
GROSSMANN LLP**

By: /s/ Michael D. Blatchley

Michael D. Blatchley, NYS Bar No. 4747424  
1251 Avenue of the Americas  
New York, New York 10020  
Telephone: (212) 554-1400  
Facsimile: (212) 554-1444  
Email: michaelb@blbglaw.com